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Attorneys for Defendant Apple Inc.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

IN RE HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:  
  
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF CHRISTINA BROWN  
IN SUPPORT OF APPLE INC.'S REPLY  
MEMORANDUM IN SUPPORT OF ITS  
INDIVIDUAL MOTION FOR SUMMARY  
JUDGMENT**

Date: March 20, 2014 and  
March 27, 2014  
Time: 1:30 p.m.  
Courtroom: 8, 4th Floor  
Judge: The Honorable Lucy H. Koh

1 I, Christina Brown, declare as follows:

2 1. I am a member of the Bar of the State of California and a counsel at O'Melveny &  
3 Myers LLP, attorneys for Defendant Apple Inc. I submit this declaration in support of  
4 Defendants Apple Inc.'s Reply Memorandum In Support of Its Individual Motion for Summary  
5 Judgment. I make this declaration based on my own personal knowledge. If called to testify as a  
6 witness, I could and would do so competently.

7 2. Attached hereto as Exhibit A is a true and correct copy of transcript excerpts from  
8 the deposition of Ed Catmull taken on January 24, 2013.

9 3. Attached hereto as Exhibit B is a true and correct copy of transcript excerpts from  
10 the deposition of Darrin Baja taken on March 1, 2013.

11 4. Attached hereto as Exhibit C is a true and correct copy of transcript excerpts from  
12 the deposition of Richard Bechtel taken on March 7, 2013.

13 5. Attached hereto as Exhibit D is a true and correct copy of transcript excerpts from  
14 the deposition of Pamela Zissimos taken on November 13, 2012.

15 6. Attached hereto as Exhibit E is a true and correct copy of transcript excerpts from  
16 the deposition of Danielle Lambert taken on October 2, 2012.

17 7. Attached hereto as Exhibit F is a true and correct copy of transcript excerpts from  
18 the deposition of Lori McAdams taken on August 2, 2012.

19 8. Attached hereto as Exhibit G is a true and correct copy of transcript excerpts from  
20 the deposition of Brian Croll taken on March 22, 2013.

21 I declare under penalty of perjury under the laws of the United States that the above is true  
22 and correct. Executed on February 27, 2014, in San Francisco, California.

23  
24 /s/ Christina J. Brown  
Christina J. Brown